

1 KEVIN V. RYAN (CSBN 118321)
United States Attorney

2 Attorney for Plaintiff

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6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 OAKLAND DIVISION

9 CR • 03 - 0015
10 No.:

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 WYATT KING,
15 QUENTIN JAMES BASTANCHURI,
16 PHILLIP GRIMES,
and REGINALD HILEY

17 Defendants.

VIOLATIONS: 18 U.S.C. § 371 —
Conspiracy; 18 U.S.C. § 2113(a) —
Bank Robbery; 18 U.S.C. § 2113(a)
& (d) — Armed Bank Robbery; 18
U.S.C. § 924(c) — Using, Carrying,
Possessing and Brandishing a Firearm
During a Crime of Violence; 18
U.S.C. § 922(g)(1) — Felon in
Possession of Firearm

OAKLAND VENUE

SBA

18
19 INDICTMENT

20 The Grand Jury charges:

21 COUNT ONE: (18 U.S.C. § 371—Conspiracy)

22 On or about January 9, 2003, in the Northern District of California, the defendants

23
24 WYATT KING,
QUENTIN JAMES BASTANCHURI,
25 PHILLIP GRIMES,
and REGINALD HILEY

26 did knowingly and willfully agree, combine and conspire with each other, and with others
27 known and unknown to the Grand Jury, to commit the crime of armed bank robbery, in
28 violation of Title 18, United States Code, Section 2113(a) and (d).

INDICTMENT

1 OVERT ACTS

2 In furtherance of the conspiracy and to accomplish the purposes thereof, the
3 defendants committed overt acts, including the following in the Northern District of
4 California on January 9, 2003.

5 1. WYATT KING, QUENTIN JAMES BASTANCHURI, and REGINALD
6 HILEY met PHILLIP GRIMES at his apartment at 9329 Bancroft Avenue in Oakland.

7 2. BASTANCHURI and HILEY got into a dark blue Chevrolet Tahoe sports-
8 utility vehicle, license plate number 4VQA778, which had previously been stolen, and
9 drove to an area in Harding Park in San Jose.

10 3. KING and GRIMES got into a white 2003 Chevrolet Cavalier, license plate
11 number 4XLZ658, which had previously been stolen, and also drove to an area in
12 Harding Park in San Jose.

13 4. Once in Harding Park, KING and GRIMES parked the white Cavalier and got
14 into the Chevrolet Tahoe with BASTANCHURI and HILEY.

15 5. All four then drove to the Bank of America at 1510 The Alameda.

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17 COUNT TWO: (18 U.S.C. § 2113(a) and (d))

18 1. On or about January 9, 2003, in the Northern District of California, the
19 defendants

20 WYATT KING,
21 QUENTIN JAMES BASTANCHURI,
22 PHILLIP GRIMES,
and REGINALD HILEY

23 did knowingly, and by force, violence and intimidation, take from the persons and
24 presence of employees of the Bank of America, 1510 The Alameda, San Jose, California,
25 approximately \$19,575 in money belonging to and in the care, custody, control,
26 management, and possession of said Bank, the deposits of which were then insured by the
27 Federal Deposit Insurance Corporation, in violation of Title 18, United States Code,
28 Section 2113(a).

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2. In committing the offense described in paragraph 1 of this Count, the defendants

WYATT KING,
QUENTIN JAMES BASTANCHURI,
and REGINALD HILEY

did assault and put in jeopardy the lives of employees and customers of said Bank, by the use of a dangerous weapon, to wit, a firearm; in violation of Title 18, United States Code, Sections 2113(a) and (d).

COUNT THREE (18 U.S.C. § 924(c))

On or about January 9, 2003, in the Northern District of California, the defendants

WYATT KING,
QUENTIN JAMES BASTANCHURI,
and REGINALD HILEY

did knowingly use, carry, possess and brandish a firearm during and in relation to the crime of violence set forth in Count Two, in violation of Title 18, United States Code, Section 924(c).

COUNT FOUR: (18 U.S.C. § 922(g)(1))

On or about January 9, 2003, in the Northern District of California, the defendant

WYATT KING

having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, specifically a Karl Walther Waffenfabrik P-38 9 mm handgun, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

Dated:

A TRUE BILL.

FOREPERSON

KEVIN V. RYAN
United States Attorney


CHARLES B. BURCH
Chief, Criminal Division

(Approved as to form: 

AUSA MICHAEL WANG